

DECLARATION OF GIANETTA TURNER

1. My name is Gianetta Turner. I am a resident of the State of Alabama, over the age of 19 years and otherwise competent to give this declaration. The facts contained in this declaration are based upon my personal knowledge.

2. I am the Manager of Payroll, Benefits, Compensation & Relocation for Hyundai Motor Manufacturing Alabama, LLC ("HMMA") I have held this position since November of 2005. My job duties include over-sight of all payroll functions and administration of all benefit plans for HMMA. These payroll functions and benefits plans are provided exclusively for HMMA employees. We do not share any payroll functions or benefit plans or any other employee compensation plans with Hyundai Motor America or any other entity.

3. I have reviewed the HMMA SAP Payroll System, which contains a listing of any and all active or terminated HMMA team members who have received compensation from HMMA at any point in time since the creation of the Company. I was unable to locate any current or former employees by the name of Ted Chung within the payroll system and therefore, no one by that name has ever been employed or received any compensation from HMMA. There are two persons on the SAP system with the last name of Chung (one was hired in late 2005 and works in the Paint Department and the other was hired in August of 2006 and works in the Engine Department). No



one with the last name of Chung has worked for HMMA or received compensation or benefits from HMMA prior to these two gentlemen

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON THIS 31st DAY OF August, 2006



GIANETTA TURNER